

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION**

ABBOTT GMBH & CO., KG,  
ABBOTT BIORESEARCH CENTER, INC.,  
AND ABBOTT BIOTECHNOLOGY LTD.,

Plaintiffs,

v.

CENTOCOR ORTHO BIOTECH, INC. AND  
CENTOCOR BIOLOGICS LLC,

Defendants.

CIVIL ACTION NO. 4:09-cv-11340-FDS

**ABBOTT’S ASSENTED-TO MOTION TO AMEND STIPULATED  
PROTECTIVE ORDER CONSISTENT WITH OCTOBER 29 ORDER**

Pursuant to the Court’s October 29, 2010, Order in *Abbott Biotechnology Ltd. and Abbott Laboratories v. Centocor Ortho Biotech, Inc.*, Civil Action No. 09-40089-FDS (D. Mass) [Dkt. No. 64] (“October 29 Order”), Plaintiffs Abbott GmbH & Co., KG (“Abbott GmbH”), Abbott Bioresearch Center, Inc. (“ABC”) and Abbott Biotechnology Ltd. (“ABL”) (collectively, “Abbott”), with the assent of Defendants Centocor Ortho Biotech, Inc. and Centocor Biologics LLC (collectively, “Centocor”), hereby move this Court to amend the Amended Stipulated Protective Order entered in this action on September 1, 2010 [Dkt. No. 77], and enter the Proposed Second Amended Stipulated Protective Order attached hereto.

The parties’ changes follow the Court’s directive in the October 29 Order, and also seek to add two in-house counsel, respectively, to paragraph 7(i)(i) and 7(i)(ii) of the Amended Stipulated Protective Order. Attached hereto as Exhibit B is redline showing the proposed

changes between the Amended Stipulated Protective Order entered by this Court on September 1, 2010, and the Second Amended Stipulated Protective Order proposed by the parties now.

Pursuant to this Court's October 29 order and for good cause shown, the parties respectfully ask that the Court grant this assented-to motion and enter the parties' Second Amended Stipulated Protective Order.

DATE: November 15, 2010

By: /s/ Robert J. Gunther, Jr.  
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*Attorneys for Plaintiffs and Counterclaim-  
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**CERTIFICATE OF SERVICE**

I certify that, on November 15, 2010, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Robert J. Gunther, Jr. \_\_\_\_\_

**LOCAL RULE 7.1(A)(2) CERTIFICATE**

I certify pursuant to Local Rule 7.1(A)(2) that the moving party has conferred in good faith with opposing counsel on the matter set forth herein and that opposing counsel does not oppose this motion.

/s/ Robert J. Gunther, Jr. \_\_\_\_\_